

1 COUNT THIRTY-TWO

2 [21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(viii)]

3 On or about July 21, 2006, in Los Angeles County, within the
4 Central District of California, defendants ANDRES RODRIGUEZ, also
5 known as ("aka") "Rascal," and DAVID EDWARD GIL, aka "L.A. Bull,"
6 knowingly and intentionally distributed at least five grams, that
7 is, approximately 15.4 grams, of actual methamphetamine, a
8 schedule II controlled substance.

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1 COUNT THIRTY-THREE
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[21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(viii)]

3 On or about July 25, 2006, in Los Angeles County, within the
4 Central District of California, defendant PETER SOTO, also known
5 as "Bouncer," knowingly and intentionally distributed at least
6 five grams, that is, approximately 13.5 grams, of actual
7 methamphetamine, a schedule II controlled substance.

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1 COUNT THIRTY-FOUR

2 [21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(viii)]

3 On or about August 16, 2006, in Los Angeles County, within
4 the Central District of California, defendant DAVID EDWARD GIL,
5 also known as "L.A. Bull," knowingly and intentionally
6 distributed at least five grams, that is, approximately 16.1
7 grams, of actual methamphetamine, a schedule II controlled
8 substance.

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1 COUNT THIRTY-FIVE
2 [21 U.S.C. §§ 841(a)(1), 841(b)(1)(A)(viii)]

3 On or about August 17, 2006, in Los Angeles County, within
4 the Central District of California, defendants MANUEL ARMENDAREZ,
5 also known as ("aka") "Mandog," and RAFAEL LOZANO, aka
6 "Peligroso," knowingly and intentionally distributed at least 50
7 grams, that is, approximately 57.2 grams, of actual
8 methamphetamine, a schedule II controlled substance.

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1 COUNT THIRTY-SIX
2 [21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(viii)]

3 On or about August 24, 2006, in Los Angeles County, within
4 the Central District of California, defendants ANDRES RODRIGUEZ,
5 also known as ("aka") "Rascal," and JOHN ALEX AZANEDO, aka
6 "Bullet," knowingly and intentionally distributed at least five
7 grams, that is, approximately 18.3 grams, of actual
8 methamphetamine, a schedule II controlled substance.

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1 COUNT THIRTY-SEVEN
2 [21 U.S.C. §§ 841(a)(1), 841(b)(1)(A)(viii)]

3 On or about September 18, 2006, in Los Angeles County,
4 within the Central District of California, defendant JORGE
5 VIRAMONTES, also known as "Solo," knowingly and intentionally
6 distributed at least 50 grams, that is, approximately 85.1 grams,
7 of actual methamphetamine, a schedule II controlled substance.

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1 COUNT THIRTY-EIGHT

2 [21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(viii)]

3 On or about September 20, 2006, in Los Angeles County,
4 within the Central District of California, defendant ANDRES
5 RODRIGUEZ, also known as "Rascal," knowingly and intentionally
6 distributed at least five grams, that is, approximately 37.6
7 grams, of actual methamphetamine, a schedule II controlled
8 substance.

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1 COUNT THIRTY-NINE
2 [21 U.S.C. §§ 841(a)(1), 841(b)(1)(A)(viii)]

3 On or about November 6, 2006, in Los Angeles County, within
4 the Central District of California, defendant RAFAEL LOZANO, also
5 known as "Peligroso," knowingly and intentionally distributed at
6 least 50 grams, that is, approximately 113.7 grams, of actual
7 methamphetamine, a schedule II controlled substance.

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1 COUNT FORTY

2 [21 U.S.C. §§ 841(a)(1), 841(b)(1)(A)(viii)]

3 On or about November 26, 2006, in Los Angeles County, within
4 the Central District of California, defendants ANDRES RODRIGUEZ,
5 also known as ("aka") "Rascal, and DAVID EDWARD GIL, aka "L. A.
6 Bull," knowingly and intentionally distributed at least 50 grams,
7 that is, approximately 56.7 grams, of actual methamphetamine, a
8 schedule II controlled substance.

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1 COUNT FORTY-ONE

2 [21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(viii)]

3 On or about March 23, 2007, in Los Angeles County, within
4 the Central District of California, defendant RAFAEL LOZANO, also
5 known as "Peligroso," knowingly and intentionally distributed at
6 least five grams, that is, approximately 14.1 grams, of actual
7 methamphetamine, a schedule II controlled substance.

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1 COUNT FORTY-TWO
2 [21 U.S.C. §§ 841(a)(1), 841(b)(1)(A)(viii)]

3 On or about March 23, 2007, in San Bernardino County, within
4 the Central District of California, defendant MANUEL ARMENDAREZ,
5 also known as "Mandog," knowingly and intentionally distributed
6 at least 50 grams, that is, approximately 55 grams, of actual
7 methamphetamine, a schedule II controlled substance.

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1 COUNT FORTY-THREE

2 [21 U.S.C. §§ 841(a)(1), 841(b)(1)(A)(viii)]

3 On or about April 7, 2007, in Los Angeles County, within the
4 Central District of California, defendant HORACIO PONCE, also
5 known as "Scorpio," knowingly and intentionally distributed at
6 least 50 grams, that is, approximately 78 grams, of actual
7 methamphetamine, a schedule II controlled substance.

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1 COUNT FORTY-FOUR
2 [21 U.S.C. §§ 841(a)(1), 841(b)(1)(A)(viii)]
3 On or about May 23, 2007, in Los Angeles County, within the
4 Central District of California, defendant MARK GARCIA, also known
5 as "Wolf," knowingly and intentionally distributed at least 50
6 grams, that is, approximately 57.5 grams, of actual
7 methamphetamine, a schedule II controlled substance.

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1 COUNT FORTY-FIVE
2 [21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(viii)]

3 On or about June 13, 2007, in Los Angeles County, within the
4 Central District of California, defendant JAIME FLORES knowingly
5 and intentionally distributed at least five grams, that is,
6 approximately 9.5 grams, of actual methamphetamine, a schedule II
7 controlled substance.

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1 COUNT FORTY-SIX
2 [21 U.S.C. §§ 841(a)(1), 841(b)(1)(A)(viii)]
3 On or about November 21, 2007, in Los Angeles County, within
4 the Central District of California, defendant ENRIQUE LOUIS
5 MUÑOZ, also known as "Hank," knowingly and intentionally
6 possessed with the intent to distribute at least 50 grams, that
7 is, approximately 66.8 grams, of actual methamphetamine, a
8 schedule II controlled substance.
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1 COUNT FORTY-SEVEN
2 [21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(viii)]
3 On or about December 13, 2007, in Los Angeles County, within
4 the Central District of California, defendant LUIS PADILLA, also
5 known as "Kiko," knowingly and intentionally possessed with the
6 intent to distribute at least five grams, that is, approximately
7 34 grams, of actual methamphetamine, a schedule II controlled
8 substance.

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1 COUNT FORTY-EIGHT
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[21 U.S.C. §§ 841(a)(1), 841(b)(1)(A)(viii)]

3 On or about February 12, 2008, in Los Angeles County, within
4 the Central District of California, defendants RAFAEL LOZANO,
5 also known as ("aka") "Peligroso," and ISMAEL RIVERA, aka "Yo-
6 Yo," knowingly and intentionally distributed at least 50 grams,
7 that is, approximately 97 grams, of actual methamphetamine, a
8 schedule II controlled substance.

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1 COUNT FORTY-NINE
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[21 U.S.C. §§ 841(a)(1), 841(b)(1)(A)(viii)]

3 On or about April 1, 2008, in Los Angeles County, within the
4 Central District of California, defendant FELIX FIGUEROA, also
5 known as "Risky," knowingly and intentionally possessed with the
6 intent to distribute at least 50 grams, that is, approximately 97
7 grams, of actual methamphetamine, a schedule II controlled
8 substance.

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1 COUNT FIFTY
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[21 U.S.C. §§ 841(a)(1), 841(b)(1)(A)(viii)]

3 On or about April 10, 2008, in Los Angeles County, within
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the Central District of California, defendant RICARDO GUTIERREZ,
5 also known as "Rick-O," knowingly and intentionally distributed
6 at least 50 grams, that is, approximately 107.1 grams, of actual
7 methamphetamine, a schedule II controlled substance.

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1 COUNT FIFTY-ONE
2 [21 U.S.C. §§ 841(a)(1), 841(b)(1)(A)(viii)]
3
4 On or about May 1, 2008, in Los Angeles County, within the
5 Central District of California, defendant RICARDO GUTIERREZ, also
6 known as "Money," knowingly and intentionally distributed at
7 least 50 grams, that is, approximately 75.4 grams, of actual
methamphetamine, a schedule II controlled substance.
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1 COUNT FIFTY-TWO
2 [21 U.S.C. §§ 841(a)(1), 841(b)(1)(A)(viii)]

3 On or about June 19, 2008, in San Bernardino County, within
4 the Central District of California, defendant RAFAEL LOZANO, also
5 known as "Peligroso," knowingly and intentionally distributed at
6 least 50 grams, that is, approximately 62.5 grams, of actual
7 methamphetamine, a schedule II controlled substance.

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1 COUNT FIFTY-THREE
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[21 U.S.C. §§ 841(a)(1), 841(b)(1)(A)(viii)]

3 On or about July 24, 2008, in San Bernardino County, within
4 the Central District of California, defendants ISMAEL RIVERA,
5 also known as "Yo-Yo," and DAVID RIVERA knowingly and
6 intentionally possessed with the intent to distribute at least 50
7 grams, that is, approximately 214.4 grams, of actual
8 methamphetamine, a schedule II controlled substance.

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1 COUNT FIFTY-FOUR
2 [21 U.S.C. §§ 841(a)(1), 841(b)(1)(A)(viii)]

3 On or about July 31, 2008, in Los Angeles County, within the
4 Central District of California, defendant VINCENT RODRIGUEZ, also
5 known as "Monk," knowingly and intentionally distributed at least
6 50 grams, that is, approximately 91.1 grams, of actual
7 methamphetamine, a schedule II controlled substance.

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1 COUNT FIFTY-FIVE
2 [21 U.S.C. §§ 841(a)(1), 841(b)(1)(B)(viii)]

3 On or about September 17, 2008, in Los Angeles County,
4 within the Central District of California, defendant MANUEL
5 JIMMIE VASQUEZ, also known as "Leatherface," knowingly and
6 intentionally possessed with the intent to distribute at least
7 five grams, that is, approximately 26 grams, of actual
8 methamphetamine, a schedule II controlled substance.

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1 COUNT FIFTY-SIX
2 [18 U.S.C. § 922(g)(1)]

3 On or about October 15, 2005, in Los Angeles County, within
4 the Central District of California, defendant JUAN ALFRED
5 GONZALEZ, also known as "Negro" ("GONZALEZ"), knowingly possessed
6 a firearm, namely, a Glock, Model 19 9 mm handgun, serial number
7 GBB197, in and affecting interstate and foreign commerce.

8 Such possession occurred after defendant GONZALEZ had been
9 convicted of at least one of the following crimes punishable by
10 imprisonment for a term exceeding one year:

- 11 1. Assault with a Deadly Weapon, in violation of California
12 Penal Code Section 245(a)(1), in the Los Angeles Superior Court,
13 Case Number A361728, on or about March 12, 1981;
14 2. Assault with Intent to Commit Bodily Harm, in violation
15 of California Penal Code Section 245(a)(1), in the Los Angeles
16 Superior Court, Case Number 32623, on or about October 15, 1982.

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1 COUNT FIFTY-SEVEN
2 [18 U.S.C. § 922(g)(1)]

3 On or about December 2, 2005, in Los Angeles County, within
4 the Central District of California, defendant JUAN ALFRED
5 GONZALEZ, also known as "Negro" ("GONZALEZ"), knowingly possessed
6 a firearm, namely, a Smith & Wesson, Model 732, .32 caliber
7 handgun, serial number AR3981, in and affecting interstate and
8 foreign commerce.

9 Such possession occurred after defendant GONZALEZ had been
10 convicted of at least one of the following crimes punishable by
11 imprisonment for a term exceeding one year:

- 12 1. Assault with a Deadly Weapon, in violation of California
13 Penal Code Section 245(a)(1), in the Los Angeles Superior Court,
14 Case Number A361728, on or about March 12, 1981;
15 2. Assault with Intent to Commit Bodily Harm, in violation
16 of California Penal Code Section 245(a)(1), in the Los Angeles
17 Superior Court, Case Number 32623, on or about October 15, 1982.

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1 COUNT FIFTY-EIGHT
2 [18 U.S.C. § 922(g)(1)]

3 On or about May 18, 2006, in Los Angeles County, within the
4 Central District of California, defendant RENATO GOMEZ ("GOMEZ")
5 knowingly possessed at least one of the following firearms: an
6 Intra-Tec, 9 mm handgun, serial number A039070; and a Mossberg 12
7 gauge shotgun, serial number R362343, in and affecting interstate
8 and foreign commerce.

9 Such possession occurred after defendant GOMEZ had been
10 convicted of at least one of the following crimes punishable by
11 imprisonment for a term exceeding one year:

12 1. Carrying a Loaded Firearm, in violation of California
13 Penal Code Section 11359, in the Los Angeles Superior Court Case
14 Number BA265141, on or about June 29, 2004;

15 2. Possession of a Controlled Substance, in violation of
16 California Health & Safety Code Section 11377(a), in the Los
17 Angeles Superior Court Case Number BA265141, on or about June 29,
18 2004;

19 3. Possessing a Firearm at a Public School, in violation of
20 California Penal Code Section 626.9, in the Los Angeles Superior
21 Court Case Number BA144810, on or about January 3, 1997.
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1 COUNT FIFTY-NINE
2 [18 U.S.C. § 922(g)(1)]

3 On or about June 5, 2007, in Los Angeles County, within the
4 Central District of California, defendant JAIME FLORES ("FLORES")
5 knowingly possessed a firearm, namely, a Norinco SKS assault
6 rifle, serial number 1601319, in and affecting interstate and
7 foreign commerce.

8 Such possession occurred after defendant FLORES had been
9 convicted of a crime punishable by imprisonment for a term
10 exceeding one year, namely, Possession of Marijuana for Sale, in
11 violation of California Health and Safety Code Section 11359, in
12 the Los Angeles Superior Court, Case Number BA259879, on or about
13 April 21, 2004.

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1 COUNT SIXTY
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[18 U.S.C. § 922(g)(1)]

3 On or about June 13, 2007, in Los Angeles County, within the
4 Central District of California, defendant JAIME FLORES ("FLORES")
5 knowingly possessed a firearm, namely, a Mossberg shotgun, serial
6 number R823455, in and affecting interstate and foreign commerce.

7 Such possession occurred after defendant FLORES had been
8 convicted of a crime punishable by imprisonment for a term
9 exceeding one year, namely, Possession of Marijuana for Sale, in
10 violation of California Health and Safety Code Section 11359, in
11 the Los Angeles Superior Court, Case Number BA259879, on or about
12 April 21, 2004.

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1 COUNT SIXTY-ONE
2 [18 U.S.C. § 924(c)]

3 On or about April 8, 2007, in Los Angeles County, within the
4 Central District of California, defendant DENIS MALDONADO, also
5 known as "Steaky," knowingly possessed a firearm, namely, a
6 Baikal ACP .380 caliber handgun, bearing serial number GO20976-
7 BTM9983, during and in relation to, and in furtherance of, a
8 crime of violence, namely, the racketeering conspiracy set forth
9 in Count One of this Indictment, a violation of Title 18, United
10 States Code, Section 1962(d).

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1 COUNT SIXTY-TWO
2 [18 U.S.C. § 924(c)]

3 On or about December 13, 2007, in Los Angeles County, within
4 the Central District of California, defendant ANDRES RODRIGUEZ,
5 also known as "Rascal," knowingly possessed firearms, namely, a
6 Glock Model 30 .45 caliber handgun, bearing serial number GKB912;
7 a Glock 9 mm handgun, with an obliterated serial number; and a
8 Llama .45 caliber handgun, bearing serial number A12613, during
9 and in relation to, and in furtherance of, a drug trafficking
10 crime, namely, conspiracy to distribute methamphetamine, a
11 schedule II narcotic drug controlled substance, in violation of
12 Title 21, United States Code, Sections 846 and 841(a)(1), and a
13 crime of violence, namely, the racketeering conspiracy set forth
14 in Count One of this Indictment, a violation of Title 18, United
15 States Code, Section 1962(d).

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1 COUNT SIXTY-THREE
2 [18 U.S.C. § 924(c)]

3 On or about March 17, 2008, in Los Angeles County, within
4 the Central District of California, defendant RUBEN CAVAZOS, also
5 known ("aka") as "Doc," RUBEN CAVAZOS, JR., aka "Lil Rubes,"
6 HECTOR GONZALEZ, JR., aka "Largo," ARTHUR ROSELI, JR., aka
7 "Chiques," ALVARO CAVAZOS, JR., aka "Al the Suit," DANIEL MEDEL,
8 aka "Big Dog," and BRIAN MCCUALEY knowingly possessed firearms,
9 namely, a .22 caliber Marlin rifle, bearing serial number
10 93448421; a Sturm Ruger Mini Thirty rifle, bearing serial number
11 197-09346; a 12 gauge Mossberg shotgun, bearing serial number
12 K419567; a .30 caliber Iver Johnson rifle, bearing serial number
13 AA66083; a loaded Taurus 9 mm handgun, bearing serial number
14 TJH52492; a loaded .45 caliber Beretta handgun, bearing serial
15 number 098560MC; a .45 caliber Para-Ordnance Warthog handgun,
16 bearing serial number P162909; a .223 caliber Keltec semi-
17 automatic rifle, bearing serial number NSD52; a loaded 5.56
18 caliber Keltec semi-automatic rifle, bearing serial number N4M46;
19 a .38 caliber Titan revolver, bearing serial number 0523545; a
20 .45 caliber Colt semi-automatic handgun, bearing serial number
21 15829B70; a .45 caliber Firestorm semi-automatic handgun, bearing
22 serial number 71-04-09140-02; a .38 caliber Smith & Wesson
23 revolver, bearing serial number BBT4960; a .45 caliber Sig-Sauer
24 handgun, bearing serial number G343 763; and a Taurus 9 mm semi-
25 automatic handgun, bearing serial number TV1 66551, during and in
26 relation to, and in furtherance of, a drug trafficking crime,
27 namely, conspiracy to distribute methamphetamine and cocaine,
28 schedule II narcotic drug controlled substances, in violation of

1 Title 21, United States Code, Sections 846 and 841(a)(1), and a
2 crime of violence, namely, the racketeering conspiracy set forth
3 in Count One of this Indictment, a violation of Title 18, United
4 States Code, Section 1962(d).

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1 COUNT SIXTY-FOUR
2 [18 U.S.C. § 924(c)]

3 On or about April 1, 2008, in Los Angeles County, within the
4 Central District of California, defendant FELIX FIGUEROA, also
5 known as "Risky," knowingly possessed a firearm, namely, a
6 Springfield Armory .45 caliber handgun, bearing serial number
7 22073, during and in relation to, and in furtherance of, a drug
8 trafficking crime, namely, conspiracy to distribute
9 methamphetamine, a schedule II controlled substance, in violation
10 of Title 21, United States Code, Sections 846 and 841(a)(1), and
11 a crime of violence, namely, the racketeering conspiracy set
12 forth in Count One of this Indictment, a violation of Title 18,
13 United States Code, Section 1962(d).

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1 COUNT SIXTY-FIVE
2 [18 U.S.C. § 924(c)]

3 On or about May 24, 2008, in Los Angeles County, within the
4 Central District of California, defendants RUBEN CAVAZOS, JR.,
5 also known as "Lil Rubes," and BRIAN MCCUALEY, knowingly
6 possessed a firearm, namely, an H&K .45 caliber handgun, bearing
7 serial number 25-093654, during and in relation to, and in
8 furtherance of, a crime of violence, namely, the racketeering
9 conspiracy set forth in Count One of this Indictment, a violation
10 of Title 18, United States Code, Section 1962(d).

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1 COUNT SIXTY-SIX
2 [18 U.S.C. § 1956(h)]

3 A. OBJECT OF THE CONSPIRACY

4 Beginning on a date unknown and continuing until on or about
5 October 9, 2008, in Los Angeles County, within the Central
6 District of California, and elsewhere, defendants RUBEN CAVAZOS,
7 also known as ("aka") "Doc" ("CAVAZOS"), RUBEN CAVAZOS, JR., aka
8 "Lil Rubes" ("R. CAVAZOS, JR."), HECTOR GONZALEZ, JR., aka
9 "Largo" ("H. GONZALEZ"), ARTHUR ROSELI, JR., aka "Chiques"
10 ("ROSELI"), JUAN MANUEL NIEVES, aka "Listo" ("NIEVES"), ANTHONY
11 MARK TINOCO, aka "Bengal" ("TINOCO"), WILLIAM MICHAEL MUNZ
12 ("MUNZ"), LAWRENCE WILSON, aka "Lars" ("WILSON"), JOSE GARCIA,
13 aka "Big Joe" ("J. GARCIA"), ROBERT VINCENT RIOS, aka "Chente"
14 ("RIOS"), and others known and unknown to the Grand Jury,
15 knowingly and intentionally conspired and agreed with each other
16 to conduct financial transactions, knowing that the property
17 involved in the financial transactions represented the proceeds
18 of some form of unlawful activity, and which property was, in
19 fact, the proceeds of specified unlawful activity, that is, a
20 conspiracy to distribute methamphetamine and cocaine, with the
21 intent to promote the carrying on of said specified unlawful
22 activity, and to conceal and disguise the nature, location,
23 source, ownership, and control the proceeds of said specified
24 unlawful activity, in violation of Title 18, United States Code,
25 Sections 1956(a)(1)(A)(i) and 1956(a)(1)(B)(i).

26 B. MEANS BY WHICH THE OBJECTS OF THE CONSPIRACY WERE TO BE
27 ACCOMPLISHED

28 The objects of the conspiracy were to be accomplished in

1 substance as follows:

2 1. The Grand Jury re-alleges and incorporates by reference
3 paragraphs 1 through 9 of Count One, setting forth the means
4 described in the conspiracy charged in Count One of this
5 Indictment.

6 2. The Grand Jury re-alleges and incorporates by reference
7 paragraphs 1 through 9 of Count Fourteen, setting forth the means
8 described in the conspiracy charged in Count Fourteen of this
9 Indictment.

10 3. Defendants would conspire and arrange with others to
11 obtain crack cocaine and methamphetamine.

12 4. Defendants H. GONZALEZ, ROSELI, NIEVES, TINOCO, MUNZ,
13 WILSON, J. GARCIA, and RIOS and others known and unknown to the
14 Grand Jury would collect proceeds derived from the drug-
15 trafficking and other crimes of the Mongols criminal enterprise
16 on a monthly basis.

17 5. Defendants H. GONZALEZ, ROSELI, NIEVES, TINOCO, MUNZ,
18 WILSON, J. GARCIA, and RIOS, and others known and unknown to the
19 Grand Jury would deliver proceeds to defendants CAVAZOS, R.
20 CAVAZOS, JR., and H. GONZALEZ for the organization.

21 6. Defendants CAVAZOS, R. CAVAZOS, JR., and H. GONZALEZ
22 would maintain bank and credit card accounts to receive proceeds
23 from the Mongols criminal enterprise.

24 7. Defendants CAVAZOS, R. CAVAZOS, JR., and H. GONZALEZ
25 would use the proceeds to promote the activities and offenses of
26 the Mongols criminal enterprise.

27 C. OVERT ACTS

28 In furtherance of the conspiracy, and to accomplish the

1 objects of the conspiracy, defendants CAVAZOS, R. CAVAZOS, JR.,
2 H. GONZALEZ, ROSELI, NIEVES, TINOCO, MUNZ, WILSON, J. GARCIA, and
3 RIOS, and others known and unknown to the Grand Jury, committed
4 various overt acts on or about the following dates, within the
5 Central District of California and elsewhere, including but not
6 limited to the following:

7 1-383. The Grand Jury re-alleges and incorporates by
8 reference paragraphs 1 through 383 of Count One setting forth the
9 overt acts of the conspiracy charged in Count One of this
10 Indictment.

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1 COUNTS SIXTY-SEVEN THROUGH EIGHTY-FOUR

2 [18 U.S.C. §§ 1956(a)(1)(B)(I), 2(a)]

3 On or about the following dates, in Los Angeles County,
 4 within the Central District of California, defendants RUBEN
 5 CAVAZOS, also known as ("aka") "Doc" ("CAVAZOS"), HECTOR
 6 GONZALEZ, JR., aka "Largo" ("GONZALEZ"), ARTHUR ROSELI, JR., aka
 7 "Chiques" ("ROSELI"), JUAN MANUEL NIEVES, aka "Listo" ("NIEVES"),
 8 ANTHONY MARK TINOCO, aka "Bengal" ("TINOCO"), WILLIAM MICHAEL
 9 MUNZ ("MUNZ"), LAWRENCE WILSON, aka "Lars" ("WILSON"), WALTER
 10 RAMIREZ, aka "Bumper" ("W. RAMIREZ"), ANDRES RODRIGUEZ, aka
 11 "Rascal" ("RODRIGUEZ"), ENRIQUE LOUIS MUÑOZ, aka "Hank"
 12 ("MUÑOZ"), JOSE GARCIA, aka "Big Joe" ("J. GARCIA"), SHAWN BUSS,
 13 aka "Monster" ("BUSS"), PETER SOTO, aka "Bouncer" ("SOTO"), and
 14 VICENTE RIOS, aka "Chente" ("RIOS"), knowingly and willfully
 15 conducted and aided, abetted, counseled, commanded, induced, and
 16 procured the following financial transactions affecting
 17 interstate and foreign commerce, knowing that the property
 18 involved in each of the financial transactions represented the
 19 proceeds of some form of unlawful activity, and which property
 20 was, in fact, the proceeds of specified unlawful activity, that
 21 is, a conspiracy to distribute methamphetamine and cocaine,
 22 knowing that each of the transactions was designed in whole or in
 23 part to conceal and disguise the nature, location, source,
 24 ownership, and control of the proceeds of specified unlawful
 25 activity:

<u>COUNT</u>	<u>DATE</u>	<u>TRANSACTION</u>
SIXTY-SEVEN	9/20/06	Payment in the amount of \$26,625 to The Comfort Inn

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1	SIXTY-EIGHT	9/20/06	\$24,087.65 in United States currency deposited in the Marquis Villas, Palm Springs account
2	SIXTY-NINE	10/06/06	\$2,000 in United States currency deposited in Marquis Villas, Palm Springs Account
3	SEVENTY	10/06/06	\$2,000 in United States currency deposited to Marquis Villa, Palm Springs
4	SEVENTY-ONE	10/10/06	Business check in the amount of \$3,252.86 issued by Trading Places International, LLC
5	SEVENTY-TWO	10/19/06	Business check in the amount of \$2,000 issued by Palm Springs Inn, LLC
6	SEVENTY-THREE	10/24/06	Deposit of US Bank check in the amount of \$3,252.86 into Washington Mutual Bank
7	SEVENTY-FOUR	8/06/07	Deposit of \$2,500 in United States currency to Washington Mutual credit card account xxxxxxxxxxxx2048
8	SEVENTY-FIVE	8/14/07	Payment to Delta Airlines charged to Washington Mutual account xxxxxxxxx2048
9	SEVENTY-SIX	9/06/07	Payment of \$7,356 in United States currency to Washington Mutual credit card account xxxxxxxxx2048
10	SEVENTY-SEVEN	9/22/07	Payment of \$5,000 to Marquis Villas, Palm Springs from Washington Mutual credit card account number xxxxxx2048
11	SEVENTY-EIGHT	10/03/07	Deposit of \$5,000 in United States currency to Washington Mutual credit card account xxxxxxxxxxxx2048
12	SEVENTY-NINE	10/05/07	\$3,000 in United States currency deposited to Marquis Villa, Palm Springs
13	EIGHTY	10/30/07	Deposit of US Bank check in the amount of \$2,750 into Washington Mutual Bank
14	EIGHTY-ONE	12/03/07	Deposit of \$2,000 in United States currency to Washington Mutual credit card account xxxxxxxxxxxx2048
15	EIGHTY-TWO	5/13/08	Deposit of \$2,000 in United States currency to Washington Mutual credit card account xxxxxxxxxxxx2048

1 EIGHTY-THREE 6/10/08 Deposit of \$2,500 in United States
2 currency to Washington Mutual credit
3 card account xxxxxxxxxxxx2048

4 EIGHTY-FOUR 7/17/08 Deposit of \$2,500 in United States
5 currency to Washington Mutual credit
6 card account xxxxxxxxxxxx2048

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1 COUNT EIGHTY-FIVE
2 [18 U.S.C. § 1963]

3 1. Paragraphs One through Seventeen of the Introductory
4 Allegations are re-alleged and incorporated herein by reference
5 as though fully set forth herein.

6 2. Pursuant to Rule 32.2, Fed. R. Crim. P., notice is
7 hereby given to the defendants that the United States will seek
8 forfeiture as part of any sentence, in accordance with Title 18,
9 United States Code, Section 1963, in the event of any defendant's
10 conviction under Counts One and/or Two of this Indictment.

11 3. The defendants CAVAZOS, R. CAVAZOS, JR., GONZALEZ,
12 ROSELI, NIEVES, TINOCO, MUNZ, WILSON, RAMIREZ, RODRIGUEZ, MUÑOZ,
13 J. GARCIA, BUSS, SOTO, RIOS, A. CAVAZOS, JR., ARMENDAREZ, R.
14 MARTINEZ, R. LOZANO, A. LOZANO, M. GARCIA, PONCE, FIGUEROA, GIL,
15 GUTIERREZ, VIRAMONTES, CANALES, J. GONZALEZ, ZUNIGA, LEYVA,
16 OWENS, MOREIN, L. PADILLA, TRUJILLO, MEDEL, BULLET, MALDONADO,
17 MONTES, WEDIG, A. LOPEZ, BRADEN, CHAVEZ, MELGOZA, TELLEZ, ANGULO,
18 CONTRERAS, ESPINOZA, RIVERA, REYNOLDS, I. PADILLA, HULL, TREVINO,
19 CHEVILLE, VALLE, LEMAY, SHAWLEY, PRICE, CORDOVA, NAVA, GOMEZ,
20 MCCUALEY, LOUIE, COTTINI, S. GONZALEZ, SOLIS, WILLIAM RAMIREZ,
21 MELCER, LOZA, NEWMAN, MORENO, SAVALA, and D. PADILLA:

22 a. have acquired and maintained interests in violation
23 of Title 18, United States Code, Section 1962, which interests
24 are subject to forfeiture to the United States pursuant to Title
25 18, United States Code, Section 1963(a)(1);

26 b. have an interest in, security of, claims against,
27 and property and contractual rights that afford a source of
28 influence over, the enterprise named and described herein, which

1 the defendants established, operated, controlled, conducted, and
2 participated in the conduct of, in violation of Title 18, United
3 States Code, Section 1962, which interests, securities, claims,
4 and rights are subject to forfeiture to the United States
5 pursuant to Title 18, United States Code, Section 1963 (a) (2);
6 and

7 c. have property constituting and derived from
8 proceeds obtained, directly and indirectly, from racketeering
9 activity, in violation of Title 18, United States Code, Section
10 1962, which property is subject to forfeiture to the United
11 States pursuant to Title 18, United States Code, Section
12 1963(a) (3).

13 4. The interests of the defendants subject to forfeiture to
14 the United States pursuant to Title 18, United States Code,
15 Section 1963(a) (1), (a) (2), and (a) (3), include but are not
16 limited to:

17 a. At least \$5,000,000.
18 b. The trademark/service mark "Mongols" (Registration
19 No. 2916965), issued to Mongol Nation, purportedly for use in
20 commerce in connection with promoting the interests of persons
21 interested in the recreation of riding motorcycles.

22 c. The real property located at 3007 Cordova Court,
23 West Covina, California.

24 5. If any of the property described in paragraph 3 above,
25 as a result of any act or omission of a defendant,

26 a. cannot be located upon the exercise of due
27 diligence;
28 b. has been transferred or sold to, or deposited with,

1 a third party;

2 c. has been placed beyond the jurisdiction of the

3 court;

4 d. has been substantially diminished in value; or

5 e. has been commingled with other property that cannot
6 be divided without difficulty, the court shall order the
7 forfeiture of any other property of the defendants up to the
8 value of any property set forth in paragraph 3 above.

9 6. The above-named defendants, and each of them, are
10 jointly and severally liable for the forfeiture obligations as
11 alleged above.

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1 COUNT EIGHTY-SIX

2 [18 U.S.C. § 982(a)(1); 21 U.S.C. § 853(a)]

3 1. Paragraphs One through Seventeen of the Introductory
4 Allegations are re-alleged and incorporated herein by reference
5 as though fully set forth herein.

6 2. The allegations contained in Counts Twelve through
7 Fifty-Five of this Indictment are hereby repeated, realleged, and
8 incorporated by reference herein as though fully set forth at
9 length for the purpose of alleging forfeiture pursuant to the
10 provisions of Title 21, United States Code, Section 853 and Title
11 18, United States Code, Section 982(a)(1). Pursuant to Rule
12 32.2, Fed. R. Crim. P., notice is hereby given to the defendants
13 that the United States will seek forfeiture as part of any
14 sentence in accordance with Title 21, United States Code, Section
15 853 and Title 18, United States Code, Section 982(a)(1), in the
16 event of any defendant's conviction under Counts Twelve through
17 Fifty-Five of this Indictment.

18 3. Defendants CAVAZOS, H. GONZALEZ, ROSELI, NIEVES,
19 TINOCO, MUNZ, WILSON, W. RAMIREZ, RODRIGUEZ, MUÑOZ, J. GARCIA,
20 BUSS, SOTO, RIOS, A. CAVAZOS, JR., ARMENDAREZ, R. MARTINEZ, R.
21 LOZANO, A. LOZANO, M. GARCIA, PONCE, FIGUEROA, GIL, GUTIERREZ,
22 VIRAMONTES, CANALES, J. GONZALEZ, ZUNIGA, R. GOMEZ, LEYVA, OWENS,
23 MOREIN, L. PADILLA, TRUJILLO, MEDEL, MALDONADO, MONTES, WEDIG, V.
24 RODRIGUEZ, A. LOPEZ, BRADEN, CHAVEZ, MELGOZA, TELLEZ, ANGULO,
25 CONTRERAS, ESPINOZA, RIVERA, DAVID RIVERA, REYNOLDS, I. PADILLA,
26 HULL, TREVINO, CHEVILLE, VALLE, LEMAY, SHAWLEY, PRICE, NAVA, R.
27 GOMEZ, MCCUALEY, LOUIE, COTTINI, S. GONZALEZ, SOLIS, WILLIAM
28 RAMIREZ, LOZA, NEWMAN, MORENO, SAVALA, VASQUEZ and D. PADILLA

1 shall forfeit to the United States the following property:

2 a. All right, title, and interest in any and all property

3 (1) constituting, or derived from, any proceeds

4 obtained, directly or indirectly, as a result of any such

5 offense; and

6 (2) any property used, or intended to be used, in

7 any manner or part, to commit, or to facilitate the commission of

8 any such offense, including but not limited to:

9 a. The real property located at 3007 Cordova Court, West

10 Covina, California.

11 b. A sum of money equal to the total value of the property

12 described in subsection (a).

13 4. Pursuant to Title 21, United States Code, Section

14 853(p), each defendant shall forfeit substitute property, up to

15 the value of the total amount described in paragraph 1, if, as

16 the result of any act or omission of said defendant, the property

17 described in paragraph 1, or any portion thereof:

18 a. cannot be located upon the exercise of due

19 diligence;

20 b. has been transferred, sold to or deposited with a

21 third party;

22 c. has been placed beyond the jurisdiction of the

23 court;

24 d. has been substantially diminished in value; or

25 e. has been commingled with other property which

26 cannot be divided without difficulty.

27 5. For each of Counts Twelve through Fifty-Four for which

28 more than one defendant is found guilty, each such defendant

1 shall be jointly and severally liable for the entire amount
2 ordered forfeited pursuant to that count.

3 A TRUE BILL
4

5 151
6 Foreperson

7
8 THOMAS P. O' BRIEN
United States Attorney

9 *Christine Ewell*

10 CHRISTINE C. EWELL
Assistant United States Attorney
11 Chief, Criminal Division

12 ROBERT E. DUGDALE
13 Assistant United States Attorney
Chief, Violent and Organized Crime Section

14
15 CHRISTOPHER BRUNWIN
Assistant United States Attorney
16 Deputy Chief, Violent and Organized Crime Section

17 REEMA M. EL-AMAMY
18 Assistant United States Attorney
Violent and Organized Crime Section

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